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California Regional Water Quality Control Board San Diego Region

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July 1, 2009

Certified Mail
7008 0150 0003 7457 8469

Mr. David Ostermann
Ramona Unified School District
720 Ninth Street
Ramona, CA 92065-2348

In reply refer to:
231219:chenning

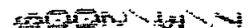
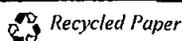
Dear Mr. Ostermann:

**SUBJECT: NOTICE OF VIOLATION NO. R9-2009-0093 AND COMMENTS ON
SELF MONITORING REPORTS FOR HANSON ELEMENTARY
SCHOOL**

Enclosed is **Notice of Violation (NOV) No. R9-2009-0093** for Hanson Elementary School located in Ramona, California. The California Regional Water Quality Control Board, San Diego Region (Regional Board) identified the violations cited in the enclosed NOV during review of the following Self Monitoring Reports required by Waste Discharge Requirements (WDR) Order No. R9-2004-0409:

PERIOD	REPORT DATE	DATE RECEIVED
July – September 2006	October 10, 2006	October 19, 2006
October – December 2006	January 11, 2007	January 18, 2007
July – December 2006	January 11, 2007	January 18, 2007
January – December 2006	January 11, 2007	January 18, 2007
January – March 2007	April 5, 2007	April 6, 2007
April – June 2007	July 5, 2007	July 12, 2007
January – June 2007	July 5, 2007	July 12, 2007
July – September 2007	October 2, 2007	October 3, 2007
October – December 2007	January 30, 2008	January 21, 2008
July – December 2007	January 30, 2008	January 21, 2008
January – December 2007	January 30, 2008	January 21, 2008
January – March 2008	April 9, 2008	April 2, 2008
April – June 2008	July 9, 2008	July 8, 2008
January – June 2008	July 9, 2008	July 8, 2008
July – September 2008	October 17, 2008	October 13, 2008
October – December 2008	January 14, 2009	January 13, 2009
July – December 2008	January 14, 2009	January 13, 2009

California Environmental Protection Agency



PERIOD	REPORT DATE	DATE RECEIVED
January – December 2008	January 14, 2009	January 13, 2009
January – March 2009	April 7, 2009	April 27, 2009

In addition to the violations noted in the NOV, a total of 73 violations of the iron and manganese performance requirements were identified in the compliance monitoring wells as summarized below:

	MW3		MW4		MW5	
	Fe	Mn	Fe	Mn	Fe	Mn
Number of Exceedances of Daily Maximum	17	7	13	4	16	3
Number of Exceedances of 12-month Average	3	3	3	1	2	1
Number of Total Samples Collected	28	23	24	21	26	21

Regional Board Comments

In addition, the Regional Board has the following comments:

1. On August 2, 2006, the Regional Board issued a NOV noting several violations of Order No. R9-2004-0409. In response to the NOV Advanced Onsite Systems on behalf of the Ramona Unified School District (District), provided two reports dated September 5, 2006 and May 1, 2007 to look into the cause of the violations. The Regional Board would like to continue discussion on the findings of these reports in order to determine how the District can best comply with regulations regarding the onsite wastewater treatment system at Hanson Elementary School. Ms. Cathryn Henning of my staff will contact you to arrange a meeting to discuss violations of Order performance requirements, operational concerns, and feasible solutions to reduce contaminant loading to the groundwater basin.
2. Submitted monitoring reports are currently signed by the contracted operator, Water Quality Specialists, and do not provide any indication to the Regional Board that the operator is communicating with management at the Ramona Unified School District. Future monitoring reports must be signed by management at the Ramona Unified School District in order to ensure the District is aware of water quality issues associated with the onsite wastewater treatment system at Hanson Elementary School.
3. Order No. R9-2004-0409 prescribes 12-month average performance requirements for groundwater samples collected from MW3, MW4, and MW5. In

July 1, 2009

future reports submitted to the Regional Board, please calculate and report the 12-month averages for total dissolved solids, nitrate (as NO₃), boron, chloride, sulfate, manganese, fluoride, methylene blue activated substances, and iron for all effluent and groundwater samples.

4. Review of the boring log and well construction of MW5 indicates that the well is screened from 23 feet below ground surface (bgs) to 121 feet bgs. This well screen encounters a confining granite layer at 20 feet bgs and a confined aquifer at 100 feet bgs. Due to the length of and the depth to the screened interval of MW5, samples collected from this well are likely not representative of the unconfined aquifer and not a good indicator of compliance with performance requirements. The Regional Board requests destruction of MW5 to prevent possible migration of groundwater in the unconfined layer to the deeper confined layer. A replacement of this well is not necessary at this time.

The next monitoring reports required to be submitted are the 2009 second quarter and 2009 semiannual reports. These reports are due by August 1, 2009.

In the subject line of any response, please include the requested "In reply refer to:" information located in the heading of this letter. For questions pertaining to the subject matter, please contact Ms. Henning at (858) 636-3161 or at chenning@waterboards.ca.gov.

Sincerely,



Julie Chan P.G.
Supervising Engineering Geologist
Groundwater Basins Branch

JAC:ag:clh

Attachments: Notice of Violation No. R9-2009-0093

CC: Steve Leech
Water Quality Specialists of San Diego, Inc.
P.O. Box 3028
Valley Center, CA 92082

CIWQS:

Regulatory Measure ID	133149				
Place ID	231219				
Enforcement ID	366144				
Violations	493679	689802	493572	689792	689779
	493678	463465	689777	463459	815272
	689808	815268	823354	690087	493671
	493588	690092	823360	690095	689776
	493587	690088	823365	815292	815270
	493592	463463	823374	689785	689773
	689805	493616	823379	493713	493668
	689796	689788	823380	493711	689768
	815264	690091	823341	690098	815269
	815276	463456	823343	690089	690097
	689789	493613	823364	463473	493676
	689787	493672	823377	493667	815311
	493574	463450	815265	493688	493684
	689784	493670	823340	423167	493586
	815259	493681	823349	493665	815266
	463472	815307	823350	422761	493669
	493615	493590	823351	815314	493625
	823416	690094	823370	493623	493621
	493675	493687	823373	493685	463470
	689800	690090	689770	690084	493666
	493674	815320	815258	815313	463466
	493576	690085	493606	493612	814729
	815260	493686	493607	463462	815273
	493575	463451	463460	823345	493624
	493609	493617	463458	823347	814727
	463467	690083	493595	823342	690096
	815262	493683	493593	823355	493619
	463464	463448	689786	823356	823375
	493596	463455	690093	823357	823339
	689804	463468	493673	823358	823348
	689795	823415	493577	823361	823363
	463454	690086	814732	823362	823366
	815308	690082	463449	823369	823367
	493682	493589	815261	823371	823376
	493591	493677	814731	823372	463452

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Daily maximum and 12-month average exceedances of performance requirements for nitrate as NO₃ in compliance wells MW3, MW4, and MW5 were identified for a total of 102 violations of Order No. R9-2004-0409.

Summary of Violations

1. VIOLATIONS OF PERFORMANCE REQUIREMENT B.1

The 12-month average performance requirement for nitrate as NO₃ in the groundwater is 9 milligrams per liter (mg/L). The following table summarizes the 9 violations of the nitrate as NO₃ 12-month average performance requirement in each compliance well:

DATE	MW3	MW4	MW5
2006	39	43	44
2007	39	48	42
2008	67	78	56

Note - all concentrations have units mg/L.

2. VIOLATIONS OF PERFORMANCE REQUIREMENT B.1

The daily maximum performance requirement for nitrate as NO₃ in the groundwater is 18 mg/L. The following table summarizes the 93 violations of the nitrate as NO₃ daily maximum performance requirement in each compliance well:

DATE	MW3	MW4	MW5	DATE	MW3	MW4	MW5
7/17/2006	38	40	38	11/6/2007	52	79	59
8/7/2006	37	40	40	12/27/2007	39	78	53
9/20/2006	35	43	37	1/8/2008	43	86	50
10/25/2006	41	38	39	2/5/2008	49	74	50
11/13/2006	40	42	45	3/4/2008	63	84	47
12/19/2006	30	60	32	4/14/2008	70	69	52
1/18/2007	38	28	39	5/13/2008	73	63	64
2/20/2007	36	52	56	6/10/2008	76	76	49
3/13/2007	40	57	56	8/18/2008	78	75	53
4/16/2007	42	44	34	9/16/2008	70	68	69
5/15/2007	66	64	48	10/29/2008	83	108	56
6/12/2007	10	10	9	11/24/2008	79	79	78
7/17/2007	35	34	32	12/8/2008	79	80	80

DATE	MW3	MW4	MW5	DATE	MW3	MW4	MW5
8/14/2007	38	36	44	1/12/2009	64	108	51
9/11/2007	42	58	51	2/23/2009	28	27	26
10/30/2007	41	38	35	3/16/2009	68	66	67

Note - all concentrations have units mg/L.

Questions pertaining to the issuance of this Notice of Violation are to be directed to Ms. Cathryn Henning at (858) 636-3161 or via e-mail at chenning@waterboards.ca.gov. Written correspondence should be directed to the following address:

Ms. Julie Chan
Supervising Engineering Geologist
California Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340



Julie Chan, P.G.
Supervising Engineering Geologist
Groundwater Basins Branch

July 1, 2009
DATE

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<p>1. Article Addressed to:</p> <p>David Ostermann Ramona Unified School District 720 Ninth Street Ramona, CA 92065-2348</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7008 0150 0003 7457 8469</p>
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